

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

)
Avondale Mills, Inc.,)
)
)
Plaintiff,)
)
)
v.)
)
Norfolk Southern Corporation, *et al.*,) Civil Action No. 1:05-CV-2817-MBS
)
)
Defendants.)
)
)
)

**EXPERT WITNESS DISCLOSURES OF DEFENDANTS NORFOLK SOUTHERN
CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the Scheduling Order in this matter, Defendants Norfolk Southern Corporation and Norfolk Southern Railway Company (hereinafter “Norfolk Southern”) hereby disclose the following experts as witnesses for trial in this case.

1. Norfolk Southern discloses the following expert witnesses and hereby certifies that copies of the reports of these experts have been provided to counsel for Avondale Mills, Inc. (“Avondale”) and Factory Mutual Insurance Company (“Factory Mutual”).
 - a. Robert Baboian, Ph.D., P.E.
RB Corrosion Service
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(401) 949-1661

- b. Warren L. Beck
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- c. George Watts Carr III
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- d. Kitty G. Dickerson, Ph.D.
University of Missouri – Columbia
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(573) 882-9638
- e. F. Dean Driskell III, MBA, CPA
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1201 West Peachtree Street, Suite 500
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- f. Craig T. Elson, CPA
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- g. Joe L. Eudy, SIA, AIC
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- h. Kevin C. Garrity, P.E.
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- i. W. Kenneth Humphries, Ph.D.
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- j. David Lasater, Ph.D., CPA
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- k. Doran V. McClellan
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- l. John M. McKinney, P.E.
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- o. David T. Robinson, Ph.D.
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- p. John R. Scully, Ph.D.
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- q. Nathan W. Shelton
1240 Taylors Road
Taylors, SC 29687
864-244-1256
2. Norfolk Southern reserves the right to designate a responsive expert to any expert designated after this date.
 3. Norfolk Southern also reserves the right to call any expert witness who may be required to substitute for another expert listed herein in the event that the listed expert becomes unavailable to testify at trial due to any circumstances beyond Norfolk Southern's control.
 4. Norfolk Southern further identifies the experts it disclosed in the *In re: Graniteville* cases and adopts the reports issued by those experts. See Defendants Norfolk Southern Corporation's and Norfolk Southern Railway Company's General Expert Witness Disclosures Pursuant to Rule 26(a)(2), Docket No. 208 (Dec. 29, 2006).

Defendants further reserve the right to supplement this list prior to trial.

Dated: January 22, 2007

Respectfully submitted,

s/ Ronald G. Tate, Jr.
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